1 2 3 4 5 6 7	DANIEL G, BOGDEN United States Attorney District of Nevada PATRICK A. ROSE Assistant United States Attorney Nevada Bar No. 5109 501 Las Vegas Boulevard South, Suite 1100 Las Vegas, Nevada 89101 Telephone: 702-388-6336 Facsimile: 702-388-6787 Email: patrick.rose@usdoj.gov Attorneys for the United States
8	UNITED STATES DISTRICT COURT
9	DISTRICT OF NEVADA
10	THE STATE OF NEVADA, Case No. 2:16-cv-00900-APG-NJK
11	Plaintiff, {
12	v. STIPULATION AND ORDER SETTING BRIEFING SCHEDULE
13	RAUL GONZALES,
14	Defendant.
15	/
16	Pursuant to this Court's Order (ECF No. 6), directing the parties to provide a joint statement with
17	a proposal for moving this case forward toward resolution, the parties, through undersigned counsel,
18	state and stipulate as follows:
19	NATURE OF PROCEEDING
20	The underlying case commenced in state court in January 2014 as a criminal case by the State of
21	Nevada, represented by Chief Deputy District Attorney, David L. Stanton, against Raul Gonzales,
22	represented by Assistant Special Public Defender, Randall H. Pike. The United States, represented by
23	Assistant United States Attorney, Patrick A. Rose, recently removed this proceeding to federal court
24	pursuant to 28 U.S.C. § 1442(a)(1), United States ex rel Touhy v. Ragen, 340 U.S. 462 (1951), and its
25	progeny, relative to two state court orders (and an underlying subpoena duces tecum) for the production
26	of FBI records.

## PROPOSED MEANS OF RESOLUTION 1 This proceeding may be resolved by motion practice. The parties stipulate to a dispositive 2 briefing schedule as follows: 3 Due date for United States' motion; June 6, 2016: 4 Due date for state court parties' oppositions; and June 27, 2016 5 Due date for United States' reply(ies). July 15, 2016 6 Respectfully submitted this 2 day of April 2016. 7 8 DANIEL G. BOGDEN United States Attorno DAVID L. STANTON Chief Deputy District Attorney 10 PATRICK A. ROSE Major Violators Unit Assistant United States Attorney Clark County D.A.s Office 11 Las Vegas, Nevada 89101 Attorneys for removing-party, Office: (702) 671-2826 the United States 12 Fax: (702) 477-2974 david.stanton@clarkcountyda.com 13 Attorney for the State of Nevada 14 15 /s/ Randall H. Pike RANDALL H. PIKE 16 Assistant Special Public Defender 330 S. Third Street Suite 800 17 Las Vegas, NV 89155 702 455-6265 18 Fax 702455-6273 19 rpike@clarkcountynv.gov Attorney for Raul Gonzales 20 IT IS SO ORDERED. 21 22 23 UNITED STATES DISTRICT JUDGE UNITED STATES MAGISTRATE JUDGE 24 **DATED:** May 2, 2016 25 26